

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. 07-254-01 and -02 (Gardner, J.)</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>VICKIE FREEMAN MICHAEL LLOYD BRUNSON</b>	<b>:</b>	<b>VIOLATIONS: 18 U.S.C. § 371 (conspiracy to make false statements to federal firearms licensees - 1 count) 18 U.S.C. § 922(a)(1)(A) (dealing in firearms without a license - 1 count) 18 U.S.C. § 924(a)(1)(A) (making false statements to federal firearms licensees - 7 counts) 18 U.S.C. § 2 (aiding and abetting) Notice of forfeiture</b>

**SUPERSEDING INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this superseding indictment:

1. The following businesses possessed federal firearms licenses (“FFLs”) and were authorized to deal in firearms under federal law:
  - a. Kayton Company, d/b/a Army&Navy Store, 1045 Grape Street, Whitehall, Pennsylvania 18052, FFL# 8-23-13438;
  - b. Koehler International Inc., d/b/a Eagle Arms Sport Shop, 9331 Hamilton Boulevard, Breinigsville, Pennsylvania 18031, FFL# 8-23-20407;
  - c. Lehigh Valley Indoor Shooters Association, d/b/a PLEOA Firing Line, 5581 Roosevelt Street, Whitehall, Pennsylvania 18052, FFL# 8-23-38928;
  - d. Frank E. Repyneck, 5402 Chestnut Street, Emmaus, PA18049 FFL# 8-23-39022;

- e. Kathleen McGorry-Lowe, d/b/a Toonerville Junction, 522 West Maple Street, Allentown, Pennsylvania 18101, FFL# 8-23-21284;
- f. Robert T. Litzenberger, d/b/a The Golden Trigger, 358 B Lower Level Main Street, Emmaus, Pennsylvania 18049, FFL# 8-23-39331; and
- g. Vernell Mae Meyers, d/b/a Meyers Gun Shop, 705 Point Phillips Road, Bath, Pennsylvania 18014, FFL# 8-23-14699.

2. FFL holders are licensed, among other things, to sell firearms and ammunition. Various rules and regulations, promulgated under the authority of Chapter 44, Title 18, United States Code, govern the manner in which FFL holders are permitted to sell firearms and ammunition.

3. The rules and regulations governing FFL holders require that a person seeking to purchase a handgun fill out a Firearm Transaction Record, ATF Form 4473. Part of the Form 4473 requires that the prospective purchaser certify that all her answers on Form 4473 are true and correct. A question on Form 4473 asks the prospective purchaser if he or she is the actual buyer of the firearm(s) listed on the form. The Form explains that to be an “actual buyer” one must be buying the firearm(s) for oneself or as a gift.

4. Another part of the Form 4473 requires that the prospective purchaser certify that she understands that making a false statement with respect to the purchase of the firearm(s) is a crime punishable as a felony.

5. A person who purchases a firearm for another person and falsely completes the Form 4473 is known as a "straw purchaser." Acting as a straw purchaser is referred to as “lying and buying.”

6. FFL holders are required to maintain a record, in the form of a completed

Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder, including the buyer's home address and date of birth.

7. From on or about July 30, 2001, through on or about July 30, 2002, in Lehigh and Northampton Counties, in the Eastern District of Pennsylvania, defendants

**MICHAEL LLOYD BRUNSON and  
VICKIE FREEMAN**

conspired and agreed, together and with others known and unknown to the grand jury, to commit offenses against the United States, that is, to knowingly make false statements with respect to the information required to be kept in the records of a federally licensed firearms dealer, specifically, the identity of the actual buyer of firearms, in violation of Title 18, United States Code, Section 924(a)(1)(A).

**MANNER AND MEANS**

It was part of the conspiracy that:

8. Defendant MICHAEL LLOYD BRUNSON arranged for defendant VICKIE FREEMAN to purchase handguns and a semi-automatic assault weapon from various Lehigh Valley federal firearms licensees for persons known and unknown to the grand jury.

9. In advance of the firearms purchases, defendant MICHAEL LLOYD BRUNSON was given cash by the actual purchasers of the firearms.

10. At defendant MICHAEL LLOYD BRUNSON's direction, defendant VICKIE FREEMAN went to the federal firearms licensees and and falsely represented on ATF Form 4473s that she was purchasing firearms for herself, when, in fact, she was purchasing them for defendant MICHAEL LLOYD BRUNSON, who then supplied them to the pre-arranged

actual purchasers.

11. Defendant MICHAEL LLOYD BRUNSON and defendant VICKIE FREEMAN used the proceeds from Freeman's straw purchases to buy "rock" or "crack" cocaine.

### **OVERT ACTS**

In furtherance of the conspiracy, defendant MICHAEL LLOYD BRUNSON and defendant VICKIE FREEMAN committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

#### The July 30, 2001 Straw Purchase

On or about July 30, 2001:

1. Defendant MICHAEL LLOYD BRUNSON arranged with a person unknown to the grand jury to supply that person a firearm.
2. Defendant MICHAEL LLOYD BRUNSON and the person unknown to the grand jury went with defendant VICKIE FREEMAN to the Army & Navy Store.
3. At the Army & Navy Store, defendant MICHAEL LLOYD BRUNSON instructed defendant VICKIE FREEMAN to purchase a firearm that defendant BRUNSON identified for her.
4. At the direction of defendant MICHAEL LLOYD BRUNSON, defendant VICKIE FREEMAN purchased a Ruger, model P95D, 9mm pistol, serial number 314-66603, from the Army & Navy Store.
5. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Ruger pistol.

6. After leaving the Army & Navy Store with the Ruger pistol, defendant VICKIE FREEMAN returned home, and defendant MICHAEL LLOYD BRUNSON supplied the Ruger pistol to the person unknown to the grand jury.

The December 19, 2001 Straw Purchase

On or about December 19, 2001:

7. Defendant MICHAEL LLOYD BRUNSON arranged with a person unknown to the grand jury to supply that person a firearm.

8. Defendant MICHAEL LLOYD BRUNSON and the person unknown to the grand jury drove defendant VICKIE FREEMAN to the Army & Navy Store.

9. At the Army & Navy Store, defendant MICHAEL LLOYD BRUNSON instructed defendant VICKIE FREEMAN to purchase a firearm that defendant BRUNSON identified for her.

10. At the direction of defendant MICHAEL LLOYD BRUNSON, defendant VICKIE FREEMAN purchased a Heritage Arms, model Stealth Shadow C4200, .40S&W caliber pistol, serial number B04908.

11. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Heritage Arms pistol.

12. After leaving the Army & Navy Store with the Heritage Arms pistol, defendant VICKIE FREEMAN returned home, and defendant MICHAEL LLOYD BRUNSON supplied the Heritage Arms pistol to the person unknown to the grand jury.

The December 20, 2001 Straw Purchase

On or about December 20, 2001:

13. Defendant MICHAEL LLOYD BRUNSON arranged with a person unknown to the grand jury to supply that person a firearm.

14. Defendant MICHAEL LLOYD BRUNSON and the person unknown to the grand jury drove defendant VICKIE FREEMAN to the Army & Navy Store.

15. At the Army & Navy Store, defendant MICHAEL LLOYD BRUNSON instructed defendant VICKIE FREEMAN to purchase a firearm that defendant BRUNSON identified for her.

16. At the direction of defendant MICHAEL LLOYD BRUNSON, defendant VICKIE FREEMAN purchased a Ruger, model P95D, 9mm pistol, serial number 314-49877, from the Army & Navy Store.

17. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Ruger pistol.

18. After leaving the Army & Navy Store with the Ruger pistol, defendant VICKIE FREEMAN returned home, and defendant MICHAEL LLOYD BRUNSON supplied the Ruger pistol to the person unknown to the grand jury.

The December 29, 2001 Straw Purchase

On or about December 29, 2001:

19. Defendant MICHAEL LLOYD BRUNSON arranged with a person unknown to the grand jury to supply that person a firearm.

20. Defendant MICHAEL LLOYD BRUNSON and the person unknown to the grand jury drove defendant VICKIE FREEMAN to The Golden Trigger.

21. At The Golden Trigger, defendant MICHAEL LLOYD BRUNSON instructed defendant VICKIE FREEMAN to purchase two firearms that defendant BRUNSON identified for her.

22. At the direction of defendant MICHAEL LLOYD BRUNSON, defendant VICKIE FREEMAN purchased a Keltec, model P-11, 9mm pistol, serial number 19238, and a KBI, model FEG, .380 caliber pistol, serial number N37317, from The Golden Trigger.

23. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Keltec and KBI pistols.

24. After leaving The Golden Trigger with the Keltec and KBI pistols, defendant VICKIE FREEMAN returned home, and defendant MICHAEL LLOYD BRUNSON supplied the Keltec and KBI pistols to the person unknown to the grand jury.

#### The January 14, 2002 Straw Purchase

On or about January 14, 2002:

25. Defendant MICHAEL LLOYD BRUNSON arranged with a person unknown to the grand jury to supply that person a firearm.

26. Defendant MICHAEL LLOYD BRUNSON and the person unknown to the grand jury drove defendant VICKIE FREEMAN to the PLEOA Firing Line.

27. At the PLEOA Firing Line, defendant MICHAEL LLOYD BRUNSON instructed defendant VICKIE FREEMAN to purchase a firearm that defendant MICHAEL

LLOYD BRUNSON identified for her.

28. At the direction of defendant MICHAEL LLOYD BRUNSON, defendant VICKIE FREEMAN purchased a Taurus, model PT138, .380 ACP caliber pistol, serial number KSF72638, from the PLEOA Firing Line.

29. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Taurus pistol.

30. After leaving the PLEOA Firing Line with the Taurus pistol, defendant VICKIE FREEMAN returned home, and defendant MICHAEL LLOYD BRUNSON supplied the Taurus pistol to the person unknown to the grand jury.

#### The First March 19, 2002 Straw Purchase

On or about March 19, 2002:

31. Defendant MICHAEL LLOYD BRUNSON arranged with a person unknown to the grand jury to supply that person a firearm.

32. Defendant MICHAEL LLOYD BRUNSON and the person unknown to the grand jury drove defendant VICKIE FREEMAN to the PLEOA Firing Line.

33. At the PLEOA Firing Line, defendant MICHAEL LLOYD BRUNSON instructed defendant VICKIE FREEMAN to purchase a firearm that defendant BRUNSON identified for her.

34. At the direction of defendant MICHAEL LLOYD BRUNSON, defendant VICKIE FREEMAN purchased a Charles Daly, model 1911 A1, .45 ACP caliber pistol, serial number 733107, from the PLEOA Firing Line.

35. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Charles Daly pistol.

36. After leaving the PLEOA Firing Line with the Charles Daly pistol, defendant VICKIE FREEMAN returned home, and defendant MICHAEL LLOYD BRUNSON supplied the Charles Daly pistol to the person unknown to the grand jury.

The Second March 19, 2002 Straw Purchase

On or about March 19, 2002:

37. Defendant MICHAEL LLOYD BRUNSON arranged with a person unknown to the grand jury to supply that person a firearm.

38. Defendant MICHAEL LLOYD BRUNSON and the person unknown to the grand jury drove defendant VICKIE FREEMAN to the Toonerville Junction.

39. At the Toonerville Junction, defendant MICHAEL LLOYD BRUNSON instructed defendant VICKIE FREEMAN to purchase a firearm that defendant BRUNSON identified for her.

40. At the direction of defendant MICHAEL LLOYD BRUNSON, defendant VICKIE FREEMAN purchased a Maadi, model AK-47, 7.62mm x 39 caliber semi-automatic assault rifle, serial number 21867, from the Toonerville Junction.

41. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Maadi semi-automatic assault rifle.

42. After leaving the Toonerville Junction with the Maadi semi-automatic

assault rifle, defendant VICKIE FREEMAN returned home, and defendant MICHAEL LLOYD BRUNSON supplied the Maadi semi-automatic assault rifle to the person unknown to the grand jury.

The Third March 19, 2002 Straw Purchase

On or about March 19, 2002:

43. Defendant MICHAEL LLOYD BRUNSON arranged with a person unknown to the grand jury to supply that person a firearm.

44. Defendant MICHAEL LLOYD BRUNSON and the person unknown to the grand jury drove defendant VICKIE FREEMAN to The Golden Trigger.

45. At The Golden Trigger, defendant MICHAEL LLOYD BRUNSON instructed defendant VICKIE FREEMAN to purchase a firearm that defendant BRUNSON identified for her.

46. At the direction of defendant MICHAEL LLOYD BRUNSON, defendant VICKIE FREEMAN purchased a Ruger, model P94, 9mm pistol, serial number 308-21072, from The Golden Trigger.

47. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Ruger pistol.

48. After leaving The Golden Trigger with the Ruger pistol, defendant VICKIE FREEMAN returned home, and defendant MICHAEL LLOYD BRUNSON supplied the Ruger pistol to the person unknown to the grand jury.

The First March 25, 2002 Straw Purchase

On or about March 25, 2002:

49. Defendant MICHAEL LLOYD BRUNSON arranged with a person unknown to the grand jury to supply that person a firearm.

50. Defendant MICHAEL LLOYD BRUNSON and the person unknown to the grand jury drove defendant VICKIE FREEMAN to the PLEOA Firing Line.

51. At the PLEOA Firing Line, defendant MICHAEL LLOYD BRUNSON instructed defendant VICKIE FREEMAN to purchase a firearm that defendant BRUNSON identified for her.

52. At the direction of defendant MICHAEL LLOYD BRUNSON, defendant VICKIE FREEMAN purchased a Taurus, model PT 92, 9mm pistol, serial number TLF56029D.

53. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Taurus pistol.

54. After leaving the PLEOA Firing Line with the Taurus pistol, defendant VICKIE FREEMAN returned home, and defendant MICHAEL LLOYD BRUNSON supplied the Taurus pistol to the person unknown to the grand jury.

The Second March 25, 2002 Straw Purchase

On or about March 25, 2002:

55. Defendant MICHAEL LLOYD BRUNSON arranged with a person unknown to the grand jury to supply that person a firearm.

56. Defendant MICHAEL LLOYD BRUNSON and the person unknown to

the grand jury drove defendant VICKIE FREEMAN to the Eagle Arms Sport Shop.

57. At the Eagle Arms Sport Shop, defendant MICHAEL LLOYD BRUNSON instructed defendant VICKIE FREEMAN to purchase a firearm that defendant BRUNSON identified for her.

58. At the direction of defendant MICHAEL LLOYD BRUNSON, defendant VICKIE FREEMAN purchased a Glock, model 26, 9mm pistol, serial number CCV394, from the Eagle Arms Sport Shop.

59. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Glock pistol.

60. After leaving the Eagle Arms Sport Shop with the Glock pistol, defendant VICKIE FREEMAN returned home, and defendant MICHAEL LLOYD BRUNSON supplied the Glock pistol to the person unknown to the grand jury.

#### The April 4, 2002 Straw Purchase

On or about April 4, 2002:

61. Defendant MICHAEL LLOYD BRUNSON arranged with a person unknown to the grand jury to supply that person a firearm.

62. Defendant MICHAEL LLOYD BRUNSON and the person unknown to the grand jury drove defendant VICKIE FREEMAN to Frank E. Repyneck's gun shop.

63. At Frank E. Repyneck's gun shop, defendant MICHAEL LLOYD BRUNSON instructed defendant VICKIE FREEMAN to purchase a firearm that defendant MICHAEL LLOYD BRUNSON identified for her.

64. At the direction of defendant MICHAEL LLOYD BRUNSON, defendant VICKIE FREEMAN purchased a Cobray, model PM11, 9mm pistol, serial number 940023007, from Frank E. Repyneck's gun shop.

65. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Cobray pistol.

66. After leaving Frank E. Repyneck's gun shop with the Cobray pistol, defendant VICKIE FREEMAN returned home, and defendant MICHAEL LLOYD BRUNSON supplied the Cobray pistol to the person unknown to the grand jury.

#### The May 18, 2002 Straw Purchase

On or about May 18, 2002:

67. Defendant MICHAEL LLOYD BRUNSON arranged with a person unknown to the grand jury to supply that person a firearm.

68. Defendant MICHAEL LLOYD BRUNSON and the person unknown to the grand jury drove defendant VICKIE FREEMAN to Frank E. Repyneck's gun shop.

69. At Frank E. Repyneck's gun shop, defendant MICHAEL LLOYD BRUNSON instructed defendant VICKIE FREEMAN to purchase a firearm that defendant BRUNSON identified for her.

70. At the direction of defendant MICHAEL LLOYD BRUNSON, defendant VICKIE FREEMAN purchased a Ruger, model P95, 9mm pistol, serial number 314-41167, from Frank E. Repyneck's gun shop.

71. Defendant VICKIE FREEMAN completed an ATF Form

4473 in which she falsely represented that she was the actual buyer of the Ruger pistol.

72. After leaving Frank E. Repyneck's gun shop with the Ruger pistol, defendant VICKIE FREEMAN returned home, and defendant MICHAEL LLOYD BRUNSON supplied the Ruger pistol to the person unknown to the grand jury.

The May 28, 2002 Straw Purchase

On or about May 28, 2002:

73. Defendant MICHAEL LLOYD BRUNSON arranged with a person unknown to the grand jury to supply that person a firearm.

74. Defendant MICHAEL LLOYD BRUNSON and the person unknown to the grand jury drove defendant VICKIE FREEMAN to Frank E. Repyneck's gun shop.

75. At Frank E. Repyneck's gun shop, defendant MICHAEL LLOYD BRUNSON instructed defendant VICKIE FREEMAN to purchase a firearm that defendant BRUNSON identified for her.

76. At the direction of defendant MICHAEL LLOYD BRUNSON, defendant VICKIE FREEMAN purchased a Cobray, model PM11, 9mm pistol, serial number 940023168, from Frank E. Repyneck's gun shop.

77. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Cobray pistol.

78. After leaving Frank E. Repyneck's gun shop with the Cobray pistol, defendant VICKIE FREEMAN returned home, and defendant MICHAEL LLOYD BRUNSON supplied the Cobray pistol to the person unknown to the grand jury.

The July 2, 2002 Straw Purchase

On or about July 2, 2002:

79. Defendant MICHAEL LLOYD BRUNSON arranged with a person unknown to the grand jury to supply that person a firearm.

80. Defendant MICHAEL LLOYD BRUNSON and the person unknown to the grand jury drove defendant VICKIE FREEMAN to Frank E. Repyneck's gun shop.

81. At Frank E. Repyneck's gun shop, defendant MICHAEL LLOYD BRUNSON instructed defendant VICKIE FREEMAN to purchase a firearm that defendant BRUNSON identified for her.

82. At the direction of defendant MICHAEL LLOYD BRUNSON, defendant VICKIE FREEMAN purchased a Ruger, model P85, 9mm pistol, serial number 303-06129, from Frank E. Repyneck's gun shop.

83. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Ruger pistol.

84. After leaving Frank E. Repyneck's gun shop with the Ruger pistol, defendant VICKIE FREEMAN returned home, and defendant MICHAEL LLOYD BRUNSON supplied the Ruger pistol to the person unknown to the grand jury.

The July 11, 2002 Straw Purchase

On or about July 11, 2002:

85. Defendant MICHAEL LLOYD BRUNSON arranged with a person unknown to the grand jury to supply that person a firearm.

86. Defendant MICHAEL LLOYD BRUNSON and the person unknown to the grand jury drove defendant VICKIE FREEMAN to Frank E. Repyneck's gun shop.

87. At Frank E. Repyneck's gun shop, defendant MICHAEL LLOYD BRUNSON instructed defendant VICKIE FREEMAN to purchase a firearm that defendant BRUNSON identified for her.

88. At the direction of defendant MICHAEL LLOYD BRUNSON, defendant VICKIE FREEMAN purchased a Hi-Point, model C9, 9mm pistol, serial number P220260, from Frank E. Repyneck's gun shop.

89. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Hi-Point pistol.

90. After leaving Frank E. Repyneck's gun shop with the Hi-Point pistol, defendant VICKIE FREEMAN returned home, and defendant MICHAEL LLOYD BRUNSON supplied the Hi-Point pistol to the person unknown to the grand jury.

#### The July 13, 2002 Straw Purchase

On or about July 13, 2002:

91. Defendant MICHAEL LLOYD BRUNSON arranged with a person unknown to the grand jury to supply that person a firearm.

92. Defendant MICHAEL LLOYD BRUNSON and the person unknown to the grand jury drove defendant VICKIE FREEMAN to Frank E. Repyneck's gun shop.

93. At Frank E. Repyneck's gun shop, defendant MICHAEL LLOYD BRUNSON instructed defendant VICKIE FREEMAN to purchase a firearm that defendant

BRUNSON identified for her.

94. At the direction of defendant MICHAEL LLOYD BRUNSON, defendant VICKIE FREEMAN purchased a Hi-Point, model C9, 9mm pistol, serial number P220262, from Frank E. Repyneck's gun shop.

95. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Hi-Point pistol.

96. After leaving Frank E. Repyneck's gun shop with the Hi-Point pistol, defendant VICKIE FREEMAN returned home, and defendant MICHAEL LLOYD BRUNSON supplied the Hi-Point pistol to the person unknown to the grand jury.

The July 15, 2002 Straw Purchase

On or about July 15, 2002:

97. Defendant MICHAEL LLOYD BRUNSON arranged with a person unknown to the grand jury to supply that person a firearm.

98. Defendant MICHAEL LLOYD BRUNSON and the person unknown to the grand jury drove defendant VICKIE FREEMAN to Meyers Gun Shop.

99. At Meyers Gun Shop, defendant MICHAEL LLOYD BRUNSON instructed defendant VICKIE FREEMAN to purchase a firearm that defendant BRUNSON identified for her.

100. At the direction of defendant MICHAEL LLOYD BRUNSON, defendant VICKIE FREEMAN purchased a Taurus, model PT111, 9mm pistol, serial number TUJ03222, from Meyer's Gun Shop.

101. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she was the actual buyer of the Taurus pistol.

102. After leaving Myers Gun Shop with the Taurus pistol, defendant VICKIE FREEMAN returned home, and defendant MICHAEL LLOYD BRUNSON supplied the Taurus pistol to the person unknown to the grand jury.

The July 30, 2002 Straw Purchase

On or about July 30, 2002:

103. Defendant MICHAEL LLOYD BRUNSON arranged with a person unknown to the grand jury to supply that person a firearm.

104. Defendant MICHAEL LLOYD BRUNSON and the person unknown to the grand jury drove defendant VICKIE FREEMAN to The Golden Trigger.

105. At The Golden Trigger, defendant MICHAEL LLOYD BRUNSON instructed defendant VICKIE FREEMAN to purchase a firearm that defendant BRUNSON identified for her.

106. At the direction of defendant MICHAEL LLOYD BRUNSON, defendant VICKIE FREEMAN attempted to purchase a Glock, model 25, 9mm pistol, from The Golden Trigger.

107. Defendant VICKIE FREEMAN completed an ATF Form 4473 in which she falsely represented that she would be the actual buyer of the Glock pistol.

108. The Golden Trigger declined to complete the sale of the Glock pistol, and defendants MICHAEL LLOYD BRUNSON and VICKIE FREEMAN left the store without the

Glock pistol.

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or about July 30, 2001 through on or about July 30, 2002, in the Eastern District of Pennsylvania, and elsewhere, defendants

**MICHAEL LLOYD BRUNSON and  
VICKIE FREEMAN**

willfully engaged, and aided and abetted the willful engaging, in the business of dealing in firearms, without being licensed to do so under the provisions of Chapter 44, Title 18 United States Code, by buying and selling to others approximately 18 firearms, that is:

1. a Ruger, model P95D, 9mm pistol, serial number 314-66603;
2. a Heritage Arms, model Stealth Shadow C4200, .40S&W caliber pistol, serial number B04908;
3. a Ruger, model P95D, 9mm pistol, serial number 314-49877;
4. a Keltec, model P-11, 9mm pistol, serial number 19238;
5. a KBI, model FEG, .380 caliber pistol, serial number N37317;
6. a Taurus, model PT138, .380 ACP caliber pistol, serial number KSF72638;
7. a Charles Daly, model 1911 A1, .45 ACP caliber pistol, serial number 733107;
8. a Maadi, model AK-47, 7.62mm x 39 caliber semi-automatic assault rifle, serial number 21867;
9. a Ruger, model P94, 9mm pistol, serial number 308-21072;

10. a Taurus, model PT 92, 9mm pistol, serial number TLF56029D;
11. a Glock, model 26, 9mm pistol, serial number CCV394;
12. a Cobray, model PM11, 9mm pistol, serial number 940023007;
13. a Ruger, model P95, 9mm pistol, serial number 314-41167;
14. a Cobray, model PM11, 9mm pistol, serial number 940023168;
15. a Ruger, model P85, 9mm pistol, serial number 303-06129;
16. a Hi-Point, model C9, 9mm pistol, serial number P220260;
17. a Hi-Point, model C9, 9mm pistol, serial number P220262; and
18. a Taurus, model PT111, 9mm pistol, serial number TUJ03222.

In violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

**COUNTS THREE AND FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1.d, 1.f, and 1.g and 2 through 6 and Overt Acts 67 through 78 of Count One are incorporated here.

2. On or about each of the dates specified in the chart below, in the Eastern District of Pennsylvania, defendant

**VICKIE FREEMAN**

knowingly made a false statement and representation with respect to the information required to be kept in the records of a federally licensed firearms dealer in connection with the acquisition or attempted acquisition of each of the firearms listed in the table below, from the federally licensed firearms dealers listed in the table below, in that the defendant FREEMAN certified on the Department of Treasury Forms 4473, Firearms Transaction Record, that she was the actual buyer of the firearms listed in the table below, when in fact, as she and defendant MICHAEL LLOYD BRUNSON knew, this statement was false and fictitious.

<b>COUNT</b>	<b>DATE AND FFL</b>	<b>FIREARM PURCHASED</b>
3	May 18, 2002 Frank E. Repyneck	1 Ruger, model P95, 9mm pistol, serial number 314-41167
4	May 28, 2002 Frank E. Repyneck	1 Cobray, model PM11, 9mm pistol, serial number 940023168

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

**COUNTS FIVE THROUGH NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1.d, 1.f, and 1.g and 2 through 6 and Overt Acts 79 through 108 of Count One are incorporated here.

2. On or about each of the dates specified in the chart below, in the Eastern District of Pennsylvania, defendants

**MICHAEL LLOYD BRUNSON and  
VICKIE FREEMAN**

knowingly made, and aided, abetted, and willfully caused, a false statement and representation with respect to the information required to be kept in the records of a federally licensed firearms dealer in connection with the acquisition or attempted acquisition of each of the firearms listed in the table below, from the federally licensed firearms dealers listed in the table below, in that the defendant FREEMAN certified on the Department of Treasury Forms 4473, Firearms Transaction Record, that she was or would have been the actual buyer of the firearms listed in the table below, when in fact, as she and defendant BRUNSON knew, this statement was false and fictitious.

<b>COUNT</b>	<b>DATE AND FFL</b>	<b>FIREARM PURCHASED</b>
5	July 2, 2002 Frank E. Repyneck	1 Ruger, model P85, 9mm pistol, serial number 303-06129
6	July 11, 2002 Frank E. Repyneck	1 Hi-Point, model C9, 9mm pistol, serial number P220260

<b>COUNT</b>	<b>DATE AND FFL</b>	<b>FIREARM PURCHASED</b>
7	July 13, 2002 Frank E. Repyneck	1 Hi-Point, model C9, 9mm pistol, serial number P220262
8	July 15, 2002 Meyers Gun Shop	1 Taurus, model PT111, 9mm pistol, serial number TUJ03222
9	July 30, 2002 The Golden Trigger	None - purchase denied: attempted purchase of 1 Glock, model 26, 9mm pistol

All in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violations of Title 18, United States Code, Sections 371  
922(a)(1)(A), and 924(a)(1)(A), as set forth in this indictment, defendant

**MICHAEL LLOYD BRUNSON and  
VICKIE FREEMAN**

shall forfeit to the United States of America the firearms involved in the commission of these  
offenses, including, but not limited to:

1. a Ruger, model P95D, 9mm pistol, serial number 314-66603;
2. a Heritage Arms, model Stealth Shadow C4200, .40S&W caliber pistol,  
serial number B04908;
3. a Ruger, model P95D, 9mm pistol, serial number 314-49877;
4. a Keltec, model P-11, 9mm pistol, serial number 19238;
5. a KBI, model FEG, .380 caliber pistol, serial number N37317;
6. a Taurus, model PT138, .380 ACP caliber pistol, serial number  
KSF72638;
7. a Charles Daly, model 1911 A1, .45 ACP caliber pistol, serial number  
733107;
8. a Maadi, model AK-47, 7.62mm x 39 caliber semi-automatic assault rifle,  
serial number 21867;
9. a Ruger, model P94, 9mm pistol, serial number 308-21072;
10. a Taurus, model PT 92, 9mm pistol, serial number TLF56029D;

11. a Glock, model 26, 9mm pistol, serial number CCV394;
12. a Cobray, model PM11, 9mm pistol, serial number 940023007;
13. a Ruger, model P95, 9mm pistol, serial number 314-41167;
14. a Cobray, model PM11, 9mm pistol, serial number 940023168;
15. a Ruger, model P85, 9mm pistol, serial number 303-06129;
16. a Hi-Point, model C9, 9mm pistol, serial number P220260;
17. a Hi-Point, model C9, 9mm pistol, serial number P220262; and
18. a Taurus, model PT111, 9mm pistol, serial number TUJ03222.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

**A TRUE BILL:**

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**FOREPERSON**

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**PATRICK L. MEEHAN**  
**United States Attorney**